



Department
for Environment
Food & Rural Affairs

Summary of responses to the call for evidence on labelling for animal welfare

August 2022

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Introduction

This document provides an overview of the substantive points raised by respondents to the call for evidence on labelling for animal welfare, which ran from 13 September 2021 to 6 December 2021.

The objective of this call for evidence was to gather evidence on the impacts of different forms of animal welfare labelling to inform any future policy proposals. With the exception of the quantitative data provided in the Annex, this summary does not typically quantify the number or proportion of respondents that raised a particular topic or opinion. This is to avoid over-simplifying the nuanced responses received, and to maintain the focus on the quality, rather than the quantity, of the evidence provided.

Instead, the summary gives a broad overview of the key themes raised in the responses provided. The wealth of detailed evidence that underlies these key themes will inform our next steps for policy development as set out on page 25.

We received 1,633 responses, including from members of the public, industry, animal welfare groups, and their members or supporters who submitted standardised responses provided by those groups. Around 93% of respondents were from individuals (1,515 in total) and around 7% were from organisations (109 in total).

We are grateful to everyone who took the time to respond to the call for evidence. The breakdown of respondents is shown in Figures 1 through 4, below.

Figure 1: Locations of individuals

Graph description: Bar chart showing Citizen Space responses to question 7, 'Where are you based in the UK?' (for responses from individuals). Of 1,335 individuals who responded to this question, 1,293 selected "England", 86 selected "Scotland", 73 selected "Wales", 10 selected "Northern Ireland", and 32 selected "Not UK based".

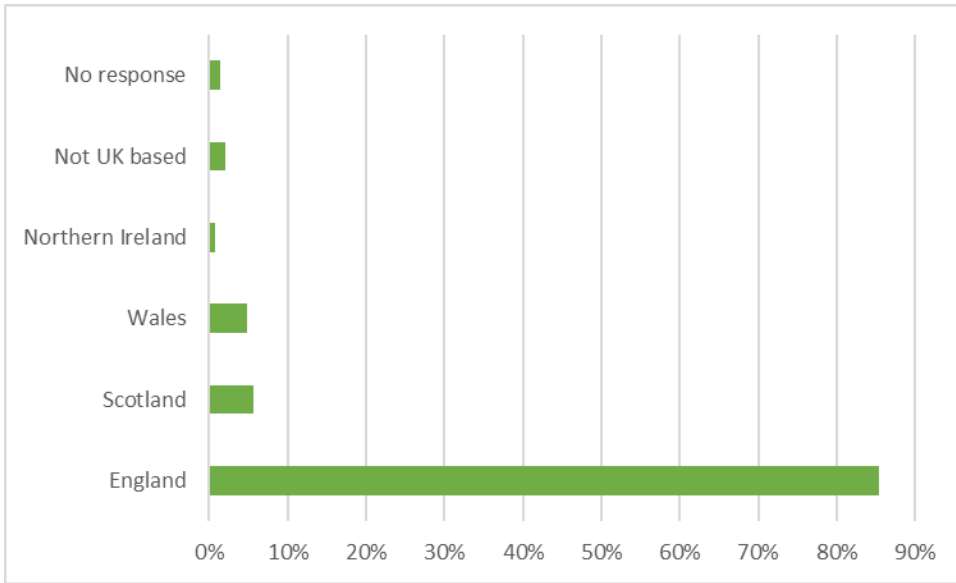


Figure 2: Location of organisations

Graph description: Bar chart combining Citizen Space responses to question 11, ‘Where does your organisation operate?’ and question 12, ‘Where are your organisation’s headquarters?’.

Of 91 organisations that responded to question 10, 72 selected “England”, 56 selected “Scotland”, 54 selected “Wales”, 42 selected “Northern Ireland”, and 25 selected “Outside the UK”; the other 18 organisations did not respond to this question.

Of 91 organisations that responded to question 11, 71 selected “England”, 9 selected “Scotland”, 2 selected “Wales”, 3 selected “Northern Ireland”, and 6 selected “Outside the UK”; the other 18 organisations did not respond to this question.

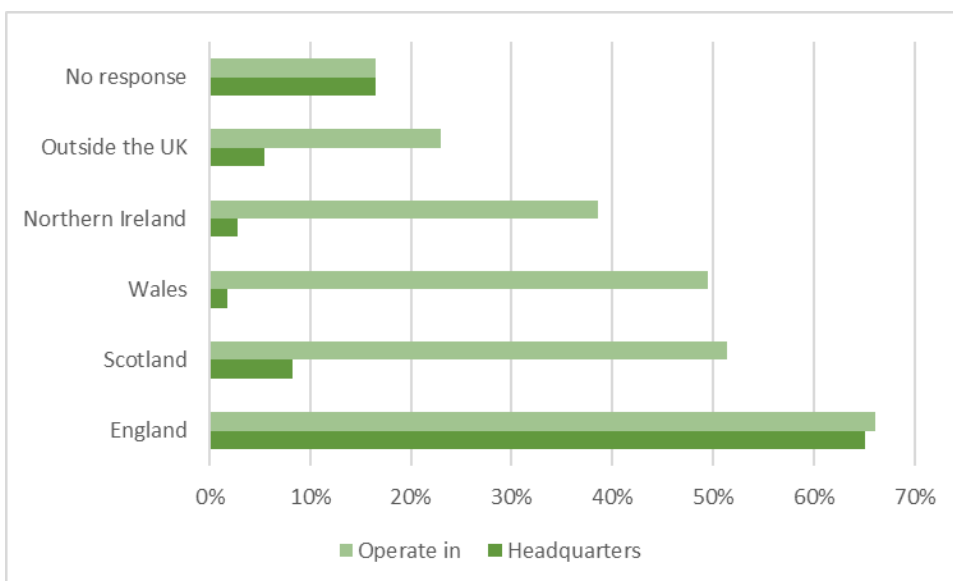


Figure 3: Type of individual

Graph description: Bar chart showing Citizen Space responses to question 5, 'Which of the below options best describes you?'. 17 respondents selected "a farmer", 8 selected "part of the food industry", 11 selected "a vet", 22 selected "an academic", 1,417 selected "an interested member of the public", and 26 selected "Other". These figures are shown as percentages in the graph below.

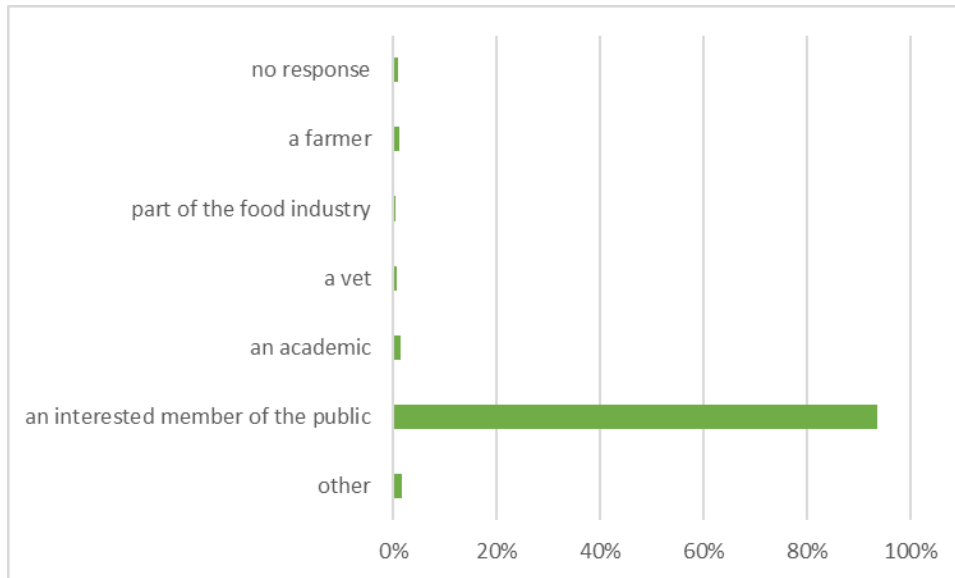
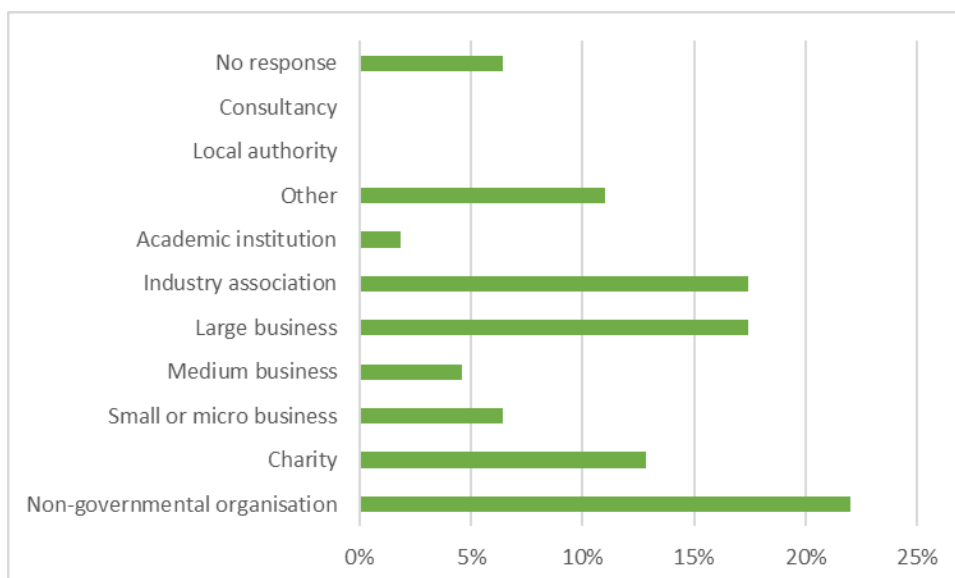


Figure 4: Type of organisation

Graph description: Bar chart showing Citizen Space responses to question 12, 'What type of organisation are you responding for?'. 24 respondents selected "Non-governmental organisation", 14 selected "Charity", 7 selected "Small or micro business (fewer than 50 employees)", 5 selected "Medium business (50-249 employees)", 19 selected "Large business (250 or more employees)", 19 selected "Industry association", 2 selected "Academic institution", and 12 selected "Other".



None of the respondents selected “Local authority” or “Consultancy”.

Headline messages

- Respondents cited polls by Compassion in World Farming, YouGov, Qa Research, and others, which found high levels of public support for reforming food labelling for animal welfare
- Respondents cited conflicting evidence about consumers’ prioritisation of animal welfare at the point of purchase, and their willingness to pay extra for higher-welfare products
- Civil society organisations and members of the public typically favoured a mandatory approach to labelling, citing the potential benefits for animal welfare, consumer transparency, and farmers meeting or exceeding baseline UK welfare regulations
- Industry associations typically favoured an industry-led approach to labelling, with many questioning the likely effectiveness of mandatory labelling and citing the potential burden on farmers and businesses
- There was broad support for the mandatory labelling of imported products from respondents across all sectors, including many of those opposed to the mandatory labelling of domestic products

Responses by section

The call for evidence on labelling for animal welfare sought evidence to inform policy development. For this reason, the summaries below are weighted toward those responses that were supported by the most robust evidence.

Questions 1-15 asked respondents for demographic data. Relevant demographic data is included in the 'Introduction' section, above. The summaries below cover questions 16-55 – those relevant to policy direction.

Labelling for animal welfare (Q16-17)

Barriers for consumers wishing to buy food produced to UK baseline welfare or higher (Q16)

Respondents provided many examples of barriers for consumers wishing to buy food produced to UK baseline welfare or higher. In particular, respondents reported a lack of transparency – without a simple standardised way of labelling for animal welfare, it is not easy for consumers to choose food that aligns with their welfare values. This view was supported in particular by members of the public, civil society organisations, and academic organisations. Such responses highlighted the current lack of welfare information provided on animal products, with many noting that this is particularly acute for imported products, processed products, products sold in the food service sector, and products sold online. Some cited polls by Compassion in World Farming, YouGov, Qa Research, and others which found high levels of public support for additional food labelling for animal welfare.¹

Many of these responses also pointed to consumer confusion around the current array of welfare-related assurance labels, including the difficulty in comparing them due to their varying emphases on welfare and different underpinning welfare standards. Responses also referenced the use of what they considered misleading imagery and branding that could portray animal products as higher welfare than they are in practice. Some highlighted consumers' lack of understanding of animal welfare practices, the terms used to describe them, and their welfare implications.

¹ For example, [Opinium](#) asked 1,990 UK adults whether animal products should be labelled according to the conditions they are raised in: 68% of respondents agreed; [YouGov](#) asked 1,652 UK adults if they would support labels on meat products indicating how the animal was raised and slaughtered: 55% of respondents supported; [Qa Research](#) asked 1,001 UK adults whether method of production labelling should be extended to all animal products: 83% of respondents agreed.

Examples of barriers provided by businesses and industry associations typically focussed more on affordability as being a major barrier, noting that higher-welfare products tend to be significantly more expensive than lower-welfare products.

Several responses also pointed to the lower availability of such products, particularly in certain contexts (for example, the food service sector).

Other responses questioned both the existence of such barriers, and the assumption that there is unmet consumer demand for higher-welfare products. Many industry associations, for example, stressed that there is already a wide array of existing farm assurance schemes and retailer schemes that provide consumers with the assurance and variety of welfare choices that they need. Some also pointed out that the UK already has some of the highest animal welfare standards in the world, stating that consumers can already distinguish British products owing to country of origin labelling requirements.

There was conflicting evidence provided in terms of consumer demand for higher-welfare products. Some evidence indicated that animal welfare is amongst the top concerns for consumers and that almost half actively seek out animal welfare information when shopping (for example, the Food Standards Agency's 2021 'Food and You 2' Wave 2 report). However, other evidence indicated that consumers' purchasing decisions are driven primarily by factors such as price and visual appearance, rather than considerations such as animal welfare; and similarly, that consumers are not willing to pay extra for higher-welfare products at the point of purchase (for example, the Agriculture and Horticulture Development Board's 2018 'Consumer Insights: The meat shopper journey' report).

Government reform of labelling (Q17)

Among individual respondents, almost all (including interested members of the public and those who identified as academics, farmers, and vets) said that the UK government should reform labelling to promote greater consistency and understanding of animal welfare information at the point of purchase. This was also supported by most academic institutions and civil society organisations, and by a minority of businesses and industry associations. Reasons given included:

- the potential of labelling to drive significant improvements in animal welfare; some pointed to mandatory egg labelling as a case study of labelling's potential to shift industry behaviour and make it easier for consumers to purchase higher-welfare products
- the need to reward farmers according to their welfare standards, including by distinguishing domestic products from imported products that do not meet UK baseline welfare regulations. Some responses also suggested that labelling could be used for exports to highlight British animal welfare standards for products sold overseas

- consumer appetite for better labelling, fuelled in part by a lack of understanding of existing labels and their implications for welfare standards

Most retailers, around half of food companies, and a minority of industry associations, supported reform in some areas. In addition to those listed above, reasons given included:

- the potential for government and industry to work together to strengthen existing assurance schemes, with Red Tractor most frequently cited
- the need for reformed country of origin labelling, particularly for processed products and in the food service sector
- the need for strengthened regulations for public procurement
- the possibility to expand existing consumer information through digital methods such as QR codes
- the need to standardise method of production in legislation, to ensure consumers can more easily understand products' welfare standards

Around half of food companies and the majority of industry associations did not support reform. Reasons given included:

- the belief that retailers are already incentivised to tap into existing consumer demand for higher-welfare products, rendering government intervention unnecessary
- the potential for unwarranted costs to industry
- the potential for increased food prices for consumers and a potential decrease in product choice if retailers chose not to stock lower-welfare products
- scepticism that labelling could alter consumer purchasing habits, and
- the belief that reform is unnecessary given the existing high animal welfare standards in the UK

Based on the evidence submitted to the 'Labelling for animal welfare' section (Q16-17), it seems likely that some consumers face barriers to purchasing products produced to UK welfare standards or higher; and that there is public appetite for improved welfare information, including labelling, to help overcome these barriers. It is clear that any reform would need to account for the range of potential costs and benefits at all stages of the supply chain, including further research on labelling's impacts on consumer purchasing habits.

Defining welfare standards (Q18-23)

Welfare standards based on inputs (Q18)

Many responses supported welfare standards based on inputs, particularly inputs relating to methods of production (such as outdoor access and environmental enrichment). They stressed that such an approach would be simpler, and more objective, than a set of outcomes-based standards. Several respondents, mostly from animal welfare organisations, provided comprehensive suggestions of species-

specific inputs that should be incorporated into the standards underpinning an inputs-based label, covering areas such as stocking density, enrichment, lighting levels, routine use of certain mutilations, access to the outdoors, and the use of slower-growing breeds.

However, some respondents, particularly from businesses, veterinary organisations, and industry associations, cautioned against a purely inputs-based approach. These respondents typically emphasised that welfare inputs like outdoor access are an imperfect proxy for animal welfare, and that animal welfare can vary significantly within specific methods of production, owing to factors such as stockmanship.

Drawing on consumer research, some respondents suggested that input considerations could provide insight into potential priority species for a label. For instance, they suggested prioritising products from more intensive production systems, such as poultry meat, pork, and eggs.

Welfare standards based on outcome measures (Q19)

Some respondents, particularly from businesses and industry associations, supported welfare standards based on outcomes, that is, measures of health and welfare. They pointed to outcomes as being a closer proxy for animal welfare than method of production alone.

However, respondents also highlighted that an effective outcome-based welfare label would be complex to put into practice. Reasons given included that:

- outcomes could fluctuate significantly within the same farm, both between herds/flocks and year-on-year
- welfare measurement would be highly species-dependent, with welfare outcomes easier to define for some species than for others
- standards based on welfare outcomes might not map onto the expectations of consumers, who typically do not have the necessary background to understand the complexities of animal welfare
- outcomes-based standards would require greater reliance on third-party inspections than an input-based set of standards – which could make it especially complex to implement for imported products
- comprehensive outcome measures rely in part on animals' emotional states, which are harder to measure than inputs

Some suggested that the best approach could be to base a set of standards primarily on inputs, but to incorporate welfare outcome measurements. This approach could potentially verify that an inputs-based set of standards truly leads to welfare improvements on-farm. For example, several respondents observed that it is possible to have low-welfare free range farms, since inputs do not necessarily guarantee good welfare.

Respondents from across all individual and organisation types also highlighted the importance of building on existing labels and assurance schemes. Examples included:

- the welfare outcome assessments being used in assurance schemes such as Quality Meat Scotland, Red Tractor, and RSPCA Assured
- the hybrid approach used in the French Étiquette Bien-Être Animal label
- initiatives such as the European Union's Welfare Quality Project and AssureWel

Similarly, in defining what constitutes 'good' animal welfare, some respondents suggested building on existing models such as the Five Freedoms and Five Domains models, and the concept of a Life Worth Living.²

There remains an evidence gap around how welfare labelling could be based on welfare outcomes alone. There do not appear to be any domestic or international examples of a labelling scheme based on welfare outcomes rather than method of production. Through our future consultation and policy development, the Government would like to understand in greater depth how welfare labelling could most effectively incorporate both inputs and welfare outcomes.

Considerations for a whole-life set of welfare standards (Q20)

Respondents provided many examples of factors that would need to be considered if the set of welfare standards were to cover the whole life of the animal. These included: breeding method; the length of time animals spent with their mothers; the need to account for imports that do not meet UK baseline welfare legislation; the need to trace animals throughout their lifetimes, noting that this would be more challenging for some species than others; the need for proper monitoring and enforcement at all stages of the animal's lifetime; to what extent animals had been transported between multiple locations as opposed to spending their whole life on the same farm; whether animals had been stunned before slaughter; the need to measure the welfare of the laying/breeding stock; and the potential to label gene-edited animals.

General points were raised about the need to: work with existing assurance schemes; ensure that the monitoring and enforcement of such standards is as transparent and cost-efficient as possible, for both domestically produced and imported food; and translate these standards into labels that are easy for the consumer to understand.

² See for example the Farm Animal Welfare Council's 2009 Report '[Farm Animal Welfare in Great Britain: Past, Present and Future](#)'

Existing marketing standards for unprocessed poultrymeat and shell eggs (Q21)

Regarding the existing marketing standards for unprocessed poultrymeat, suggestions for improvement included: reviewing regulations to ensure they are relevant to modern production systems; extending the regulations to also cover processed poultry products; changing the regulations to make them mandatory as opposed to voluntary; and including additional terms to provide greater differentiation between methods of production.

Regarding shell eggs, some respondents believed that the existing marketing standards are already fit for purpose and easily understood by consumers. Suggestions for improvement included extending the scope to cover processed and ingredient eggs.

Across both sets of marketing standards, respondents suggested: updating the welfare standards to incorporate more stringent welfare criteria; carrying out a comprehensive review to ensure that these standards are still up to date and achieving their original objectives; improving consumer education around the implications of the welfare standards set out in these regulations; and supplementing existing information on method of production with welfare outcome assurances.

Method of slaughter labelling (Q22)

Many respondents argued that there was a need for mandatory labelling on meat products to indicate whether the animal had been stunned prior to slaughter. Such responses typically stated that such information was needed in order for consumers to make informed purchases in line with their values. Some asserted consumers' right to avoid purchasing meat from animals that have been slaughtered without stunning out of concern for animal welfare. Some also stated the need for consumers to identify and purchase meat which has been prepared in accordance with their religious beliefs. Some respondents raised the possibility that providing information on the specific method of slaughter used could lead consumers to decrease their meat consumption, citing this as a positive for animal welfare.

Among those respondents that did not support method of slaughter labelling, many pointed to the role of existing assurance schemes, such as Red Tractor, that already provide assurance to consumers who wish to purchase meat from animals that have been stunned before slaughter. Again, some respondents raised the possibility that providing information on the specific method of slaughter used could lead consumers to decrease their meat consumption, citing this as a potential risk to the meat industry. Some respondents voiced concerns that labelling might present problems for Kosher and Halal supply chains. Certain respondents also expressed a preference for labelling that describes the specific method of slaughter (for example,

captive bolt, electric water bath) rather than focussing on the pre-slaughter stunning aspect. Some of these respondents suggested that more evidence is needed on how effectively specific methods of pre-stunning can reduce suffering.

Method of slaughter labelling format options (Q23)

Among those who thought that method of slaughter labelling regulations should be part of a wider set of animal welfare standards, where the label indicates the welfare of the whole life of the animal, reasons given included:

- the need to consider the animal's welfare at every stage of its life, rather than focus particularly on method of slaughter
- the potential to create 'information overload' by trying to communicate too much specific information on the product packaging
- the potential to unsettle consumers by providing specific information about animal slaughter practices, with some citing the potential for deterring consumers from purchasing meat products altogether

Among those who supported a standalone label indicating method of slaughter, the main reason given was the need to provide as much specific information as possible in order to ensure consumer transparency. Some worried that inclusion of method of slaughter information in a wider label could make it harder for those consumers who care specifically about method of slaughter above other welfare considerations to access the information they seek.

Some respondents suggested a hybrid approach, positing a label that provides specific information on the animal's welfare at all stages of its life – including, but not restricted to, method of slaughter. Similarly, some suggested introducing a standalone method of slaughter label as a relatively simple starting point, with a view to incorporating this into a wider set of standards further down the line.

Based on the evidence submitted to the 'Defining welfare standards' section, the Government will co-develop proposals for labelling welfare standards with stakeholders prior to consultation. This will take into account how best these can build on existing standards and assurance schemes. A particular area of interest is how best to incorporate welfare outcomes into a set of standards in a pragmatic way.

Approaches to labelling (Q24-28)

Most effective form of labelling (Q24)

Most members of the public, civil society organisations, and academic organisations favoured a mandatory approach to labelling, citing the potential benefits for animal

welfare, consumer transparency, and farmers meeting or exceeding baseline UK welfare regulations. A minority of businesses (for example, three of the top ten UK food retailers) also supported this approach. Of those respondents that advocated for mandatory labelling, the main reason given was that mandatory labelling would ensure that all products are consistently labelled, including imports and lower-welfare products. Respondents contrasted this to voluntary labels that typically only identify higher-welfare products.

These respondents typically referred to the current array of voluntary schemes as being confusing for consumers, and highlighted the potential for mandatory labelling to improve consumer understanding and confidence in their purchasing decisions. Respondents also cited the potential role of mandatory labelling in securing a level playing field for farmers who meet UK baseline standards, and in encouraging industry to raise welfare standards of products they sell. Some pointed to the increased market share of higher-welfare eggs as a success story for mandatory labelling, which more than doubled from 2004 (32%) to 67% in 2019. Some animal welfare organisation respondents contrasted this to voluntary labelling for poultry meat, noting the low market share (approximately 5%) of free range and organic poultry meat. Some industry association respondents highlighted this same example of voluntary poultry meat labelling as evidence of low consumer demand for such products.

Industry associations and businesses typically favoured an industry-led approach to labelling, with many questioning the likely effectiveness of mandatory labelling and citing the potential burden on farmers and businesses. Respondents that advocated for industry-led labelling often pointed to the existing array of assurance schemes in the UK, with some suggesting that government should prioritise raising awareness of these. Some respondents cited the flexibility of industry-led labelling and its ability to adapt to shifting market demand. Some of these respondents emphasised that welfare standards should be dictated by the UK legal baseline and/or retailers' sourcing policies, as opposed to mandatory labelling.

Many of these respondents also expressed concerns about the logistical complexities and potential costs of mandatory labelling. They questioned in particular consumers' willingness to pay a premium for higher-welfare products, highlighting the current low market share of such products.

Some respondents that predominantly supported industry-led labelling also raised the importance of voluntary legal standards. Reasons given included that defining terms in legislation would improve consistency of labelling and improve consumer transparency, and help to create a level playing field for industry actors.

Labelling imported products that do not meet baseline UK welfare regulations (Q25)

Across all organisation types and individual types, most respondents stressed the potential benefits of labelling imported products to identify those that do not meet baseline UK welfare regulations.

Common themes among supportive responses included:

- the belief that UK producers are currently unable to compete on a level playing field with overseas producers, given the lower welfare standards and/or production costs prevalent in many other countries
- the concern that new trade deals could increase the import of low-welfare products into the UK – particularly in those sectors where the UK currently imports a high proportion of products, such as the pork sector
- the concern that consumers may not currently realise that the products they purchase do not necessarily meet UK baseline welfare standards

In this context, many saw labelling of imported products as an opportunity for UK farmers to distinguish their products from lower-welfare imports and raise consumer awareness of the UK's high animal welfare standards. Some respondents believed that the majority of the UK public want imported products to be at least as high-welfare as those produced in the UK, and that they would like to do more to support high-welfare farmers, with labelling being one avenue to help enable this.

Respondents also highlighted the complexities of labelling imported products for animal welfare, with some food companies and industry associations seeing these complexities as too great for such a scheme to be viable. These included the difficulties of monitoring and enforcing welfare standards through international supply chains, and of harmonising potentially conflicting welfare standards across different countries.³ Some also noted that a labelling scheme would need to consider applicable World Trade Organisation rules. A few respondents noted the potential benefits of a labelling system for imports, but opposed this on the assumption that this would need to be accompanied by the labelling of domestic products.

Business decisions (Q26-28)

When asked about possible business decisions as a result of a mandatory label, many respondents suggested that this could lead farmers to invest in higher-welfare systems. Examples varied across species but included possible changes to feed sources, infrastructure, production system type, space allowance, and health plans.

³ Considerations around monitoring and enforcement are discussed further on page 23 of this document.

Some of these respondents also suggested that labelling reform could be a useful opportunity to streamline existing inspections for farmers, thereby reducing the burden of auditing. However, some industry associations noted concerns about the potential for negative impacts on farmers. For example, some respondents noted that farmers could feel under pressure to change their production system against their wishes. Respondents also highlighted the importance of ensuring that reform did not unintentionally favour higher-yielding, lower-welfare systems, or imported products over domestic ones. Some stressed the need for further information about the nature of labelling reform before being able to assess likely business decisions.

Some respondents believed that mandatory labelling could incentivise investment in high animal welfare across the supply chain. For example, respondents noted that retailers might shape demand by increasingly sourcing from high-welfare farms or requiring their suppliers to improve their welfare standards, as well as providing a greater range of higher-welfare products and positioning these more prominently in-store or on menu. However, some food companies and industry associations were concerned that mandatory labelling might lead businesses to streamline production and reduce the range of products they sell, leading to fewer available options.

Based on the evidence submitted to the questions in this section, the Government is especially interested in exploring the potential of mandatory labelling, particularly given its ability to ensure labelling of lower-welfare products, including imports that do not meet UK baseline welfare legislation. Further consultation will therefore focus on proposals to expand and reform existing mandatory labelling. Proposals will be co-designed with industry and other key stakeholders to take full account of potential costs and benefits at all stages of the supply chain.

Label format (Q29-33)

Most effective labels (Q29-32)

Across all organisation types and individual types, there was broad consensus on the importance for any label to be clear and informative. Many recommended a label with an intuitive design that could be quickly understood. In this vein, some recommended the inclusion of images of the relevant production system in order to target a wide demographic, both as a quick visual reference and to benefit those who cannot read English. Respondents commonly recommended the use of colour and intuitive grading make the label as intuitive as possible: for example, by using alphabetic grading (such as an 'A-E' scale) rather than a numerical one (such as a '1-5' scale). Some noted that a full description of the criteria for each level should be available online to assist those consumers wanting more information, with a few suggesting that QR codes could play a role here.

Many respondents advocated for the inclusion of multiple tiers, including one indicating the legislative baseline. Supporters of such an approach suggested that it could allow for the incorporation of a broader range of farming systems and farmers than alternative systems, and produce a wider range of products for consumers to buy according to their personal preferences and willingness to pay. Some also saw this approach as having the greatest potential to improve animal welfare, given the potential for a business's products to progress up the tiers as it made animal welfare improvements. However, some respondents voiced concerns that a tiered system might introduce confusion for consumers about which tier meets their values.

Some respondents raised more fundamental concerns around the design of a welfare label. For example, there were concerns that complex production systems or multi-origin ingredients would be difficult to convey through an on-pack label.

Effectiveness of existing labels (Q33)

Many respondents noted that current UK welfare-related labels are not easily comparable between each other, especially for the ordinary consumer, and highlighted a need for greater standardisation. Many also felt that some information provided on labels currently could be construed as misleading, such as the use of stock images of idyllic farm scenes on product packaging. Among those respondents that noted the success of existing UK labelling, Red Tractor and RSPCA Assured were the most frequently cited examples.

Other overarching themes included: consumers' lack of understanding of production methods (such as the difference between 'free range' and 'organic'); similarly, the need for supporting text or a grading system to help consumers understand the implications of different production methods; and the benefits of a holistic approach to assessment of animal welfare. Some called for caution in adopting labelling approaches that have been used overseas, noting that these might not be directly transferable to the UK given the differences in markets and production infrastructure.

Based on the evidence submitted to the 'Label format' section, the Government plans to carry out robust consumer research as part of future policy proposals to understand how labelling can be designed in as informative, clear, and engaging a way as possible.

Scope and impact of labelling (Q34-47)

Unprocessed products (Q34-37)

Respondents cited a wide range of possible impacts of mandatory labelling.

Many respondents, including most of those who identified as farmers, argued that mandatory labelling would benefit UK farmers, due to an increased visibility of their high welfare standards. However, some respondents, including most industry associations, expressed concerns that farmers would incur costs if they transitioned to higher-cost, higher-welfare production systems. Discussing impacts on industry, respondents suggested that mandatory welfare labelling for unprocessed animal products would incur segregation, tracing, and labelling costs.

In terms of the impact on consumers, potential benefits mentioned included increased consumer trust in the UK food system and an increase in consumers' ability to make informed decisions through greater transparency. Negative impacts mentioned by several businesses and industry organisations included a potential decrease in product ranges, and a potential impact on food prices.

Most respondents from academic institutions, civil society organisations, and all individual types cited mandatory labelling's potentially significant positive impacts for animal welfare. These respondents typically stemmed from the belief that mandatory labelling would lead to an increase in the proportion of higher-welfare product purchases, thereby driving an improvement in animal welfare standards. Other respondents from some industry associations and food companies maintained that impacts for animals would be negligible. For example, some respondents doubted that consumer demand would be high enough to drive significant change. Some animal NGOs suggested that the inclusion of farmed fish in a new labelling scheme could be particularly impactful for improving animal welfare.

To mitigate potential negative impacts, many respondents from all types of organisation stressed the importance of financial support for a transition to higher welfare standards, at the farm level and throughout the supply chain. Respondents, particularly from businesses, also suggested a need for ample lead-in times (with suggestions typically ranging from one year to three years) and a phased approach to labelling reform. Several respondents suggested promotional campaigns to ensure awareness of any reforms among consumers and actors throughout the supply chain. Many industry respondents stressed the importance of working with industry and of building on existing standards, including with the work of well-recognised assurance schemes such as Red Tractor. Some respondents, particularly from the public and civil society organisations, also highlighted welfare labelling reform as an opportunity to simplify labels, both in terms of the amount of information they contain and the way in which it is communicated. Another common theme was the need for any measures to build on robust evidence and consumer research. Some respondents, particularly from industry associations, argued that a voluntary or commercially-led scheme would be best able to mitigate negative impacts.

Prepacked processed products (Q38-42)

There was consensus that any labelling reform impacting processed products would be more complicated, but also more effective at fulfilling Government objectives.

Several respondents cited evidence that the significant majority of all food consumed by adults is processed.⁴ Some respondents indicated that welfare standards of processed food, such as the eggs used in egg products, are typically lower than those of unprocessed foods.

Respondents highlighted several barriers to labelling reform for processed products, such as the lack of a UK regulatory framework setting out definitions of the terms 'minimally processed' and 'major ingredient'. Some noted that products containing multiple animal products, such as lasagne, add a further layer of complexity to any potential label for processed products. Respondents also noted the difficulty of creating a label for processed products that can convey sufficient information to ensure transparency, while also being easily understood by the consumer.

A few respondents offered precedents for the labelling of processed products, such as labels by Red Tractor, Quality Meat Scotland, Tesco, and Sainsbury's.

Mass catering: Barriers for consumers (Q43)

Many respondents from across all individual and organisation types asserted that it is more difficult for consumers to purchase products in line with their values in the catering sector than in a retail context.

The main barrier cited was the lack of welfare information available to consumers in the food service sector. Some respondents also observed that there is a greater prevalence of lower-welfare and imported products in the catering sector than in the retail sector.

Some respondents noted that the available information is usually provided at the business level, rather than on individual products, and expressed concerns that this is not sufficiently granular. Some respondents noted that companies may mention animal welfare as part of their corporate social responsibility policy, but that this information should be made more accessible to consumers. Respondents also mentioned that some companies use welfare terms on menus, or advertise their use of certification schemes, but that such terms can cause confusion for consumers. This included the use of terms such as "locally sourced", which some consumers associate with higher animal welfare.

⁴ For example, Rauber et al.'s [2018 report on ultra-processed food consumption in the UK](#)

Some respondents from industry associations questioned whether consumers actually want information about the welfare provenance of the products they consume when eating out.

Mass catering: Barriers for caterers (Q44)

Discussing barriers for caterers, many respondents highlighted the complex and fragmented nature of the supply chain. Examples of this included the fact that food service sector businesses may source from many different suppliers every year, each with potentially differing animal welfare standards. For this reason, larger conglomerates with more integrated supply chains may face fewer difficulties than smaller businesses.

Mass catering: Policy options & impacts (Q45-47)

Respondents suggested various policy options to help overcome the challenges faced in the catering sector. Some stated that mandatory on-menu welfare labelling could be the most effective way to ensure a level playing field and drive consumer demand. For example, most animal welfare organisations listed this as their preferred policy option. However, many respondents noted the logistical complexity of such a scheme, instead proposing alternatives such as improved country of origin labelling and mandatory disclosure of welfare standards on websites.

Many respondents cited similar impacts of potential labelling reform as in previous answers. Potential negative impacts cited included increases in prices when eating out, and closures due to increased burden. Positive impacts cited included a rise in welfare standards due to an increased demand for higher-welfare products, and an opportunity for businesses to leverage animal welfare as a way to increase their competitiveness. Strategies suggested for mitigating negative impacts included an exemption for small businesses with fewer than 250 employees.

Evidence submitted to the ‘Scope and impact of labelling’ section indicated numerous potential benefits of mandatory labelling for UK farmers, consumers, and animal welfare. Respondents also raised numerous potential costs and challenges that would need to be fully accounted for in labelling policy proposals. In this vein, respondents provided several possible approaches to help mitigate any potential burden of welfare labelling reform on industry, many of which are reflected in our guiding principles for labelling (see ‘Next steps’ section).

There is also broad consensus on the need for any measures in the retail sector to be accompanied by complementary measures in the catering sector, though further evidence is needed around the nature of such measures.

Further evidence is also needed on the potential impacts of extending labelling to processed products.

Monitoring and enforcement (Q48-51)

Strong monitoring and enforcement was cited as crucial to the success of any labelling reform by respondents across all individual and organisation types. Some respondents suggested that an effective monitoring and enforcement regime could be led by an independent organisation that runs annual audits and unannounced checks, and which is able to impose penalties for noncompliance. Example penalties cited ranged from training for minor infractions to financial penalties for repeat offenders. Some expressed concerns around the level of funding required for such a scheme.

Many respondents, particularly from industry associations, noted the potential increased burden of additional auditing. However, some suggested that a mandatory scheme could lessen the auditing burden by streamlining the numerous separate audits that a farmer might undergo. Technological solutions were also cited as a means of simplifying monitoring and enforcement.

Several respondents suggested integrating any new monitoring and enforcement mechanism with existing certification schemes. Red Tractor and RSPCA Assured in particular were mentioned. Other proposed avenues to explore included working with local authority Trading Standards Services, and exploring the potential of earned recognition.

Many respondents stressed the importance of ensuring accreditation of imports to ensure compliance by countries with lower baseline welfare standards than those in the UK. Some noted the possible complexities of such accreditation, and the potential costs involved. Some respondents proposed that agreed equivalencies for organic schemes could serve as a template.

Based on the evidence submitted to the 'Monitoring and enforcement' section, there is clear appetite for any welfare labelling reform to build on, and partner with, existing assurance schemes, particularly Red Tractor. As one of our guiding principles we will seek to align with existing accreditation and assurance schemes where possible.

Aligning with wider food labelling reform (Q52-55)

Respondents offered a range of marketing terms that they felt could potentially mislead consumers. Some of the terms cited included 'pasture fed', 'soya free', 'hormone free', and 'UK-produced'. Many respondents provided specific examples in

response to the question about potentially misleading branding, such as a hypothetical 'Chalk Down Farm'. Common examples included the use of potentially misleading farm-related imagery and branding on some products, and on-pack claims about the positive experiences of the animals in the product's supply chain.

To ensure a clear and consistent approach to labelling, some respondents suggested traffic light and energy efficiency labels as templates and highlighted the value of running education campaigns to increase understanding of any new consumer information. Respondents also mentioned the importance of clear guidance and lead-in times for businesses.

Respondents favouring an integrated label felt that this would allow environmental and animal welfare issues to be considered holistically and could require less space on packaging. These respondents also expressed concerns that multiple labels would cause confusion.

Respondents favouring separate labels suggested that this approach would afford greater transparency, allowing consumers to access more granular data. These respondents also expressed concerns that the compromises needed for a unified label could water down the underlying standards.

Some respondents suggested a tension between what is best for the environment and for animals, which they believed could complicate the production of a combined label or score for these factors. Other respondents questioned whether environment and animal welfare necessarily conflict, pointing to existing schemes that take a nuanced approach to linking environment and animal welfare, while recognising possible trade-offs. The LEAF Marque was cited as an example of this.

Some respondents recommended building on existing templates that seek to integrate multiple values into a single label, such as the Global Farm Metric or Professor Tim Lang's proposed 'omni-label'. Several respondents cited digital solutions, such as QR codes.

There was broad consensus among respondents that a joined-up approach across different labelling reforms would be essential to minimise costs and burden.

A key theme emerging from evidence submitted was the need for consistent standards across values such as animal welfare and sustainability.

Based on the evidence submitted to the 'Aligning with wider food labelling reform' section, one of our guiding principles as we develop policy proposals for consultation will be to ensure alignment with broader labelling reform. We will also use this as an opportunity to seek to simplify, and clarify, existing welfare labelling where possible.

Next steps

Based on the evidence provided, it seems likely that some consumers face barriers to purchasing products produced to UK welfare standards or higher; and that there is public appetite for improved welfare labelling to help overcome these barriers. The Government is especially interested in exploring the potential of mandatory labelling, particularly given its ability to ensure labelling of lower-welfare products, including imported products that do not meet UK baseline welfare legislation.

We recognise the regulatory impact that mandatory labelling could have on businesses, and will co-develop proposals with industry and other key stakeholders to take full account of the potential costs and benefits at all stages of the supply chain. Any future labelling reform would seek to minimise burden on industry by putting in place appropriate mitigation measures, and we will work further with stakeholders to identify what form such measures could take.

Building on the findings of this call for evidence, in 2023 the UK Government will therefore consult on proposals to improve and expand current mandatory labelling requirements for animal welfare, and to introduce complementary measures in the food service sector. These proposals will cover both domestic and imported products, taking into account our international trade obligations.

This consultation will form part of our longer-term work to improve the resilience and diversity of domestic food systems, building on the Food Data Transparency Partnership, announced in the government's Food Strategy White Paper. This partnership will work with industry, civil society, and consumer groups to develop and publish definitions of consistent metrics and standards for animal welfare, health, and sustainability in the food sector.

Based on the responses to that consultation, the government will decide whether to reform welfare labelling, and what form any such reforms should take. As set out in the Call for Evidence, the objectives of any reform would be to:

- Make it easy for consumers to choose food products that align with their values by ensuring that UK baseline and higher-welfare products are accessible, available, and affordable
- Support farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market
- Improve animal welfare by unlocking untapped market demand for higher-welfare products

A set of guiding principles for any labelling reform have emerged from the responses to the call for evidence. Decisions on the nature and extent of any welfare labelling

reform will be based on the principle that reforms should only be introduced where they:

- are based on robust evidence and consumer research
- build on existing measures and align with existing accreditation and assurance schemes where possible
- have been co-developed with stakeholders across the whole supply chain, including the metrics and standards underpinning any reform.
- minimise burden on industry by putting in place appropriate mitigation measures (such as sufficient transition and compliance periods) and aligning with labelling reforms in other areas wherever possible
- prioritise sectors with: existing measures and relatively broad agreement on welfare standards (such as the voluntary poultry meat marketing regulations); the greatest differentiation in welfare standards (including between domestic and imported products); and the greatest level of consumer interest
- are only extended incrementally to other sectors and products (for example, more processed products) if initial changes are deemed successful

Additionally, where possible, welfare labelling reform should seek to:

- simplify information for the consumer; for example, through standardised terminology used across retailers, foodservice, product categories, and different parts of the supply chain
- not overcrowd food packaging, and indeed streamline existing on-pack labelling where possible

Recognising that animal welfare and food labelling are devolved, the UK Government, Scottish Government, Welsh Government, and Northern Ireland Executive will work together to agree the extent of coverage of this consultation across the UK.

Annex: Quantitative data

Excluding demographic questions (Q1-15), the call for evidence contained 8 questions with a quantitative component. Other questions were free text.

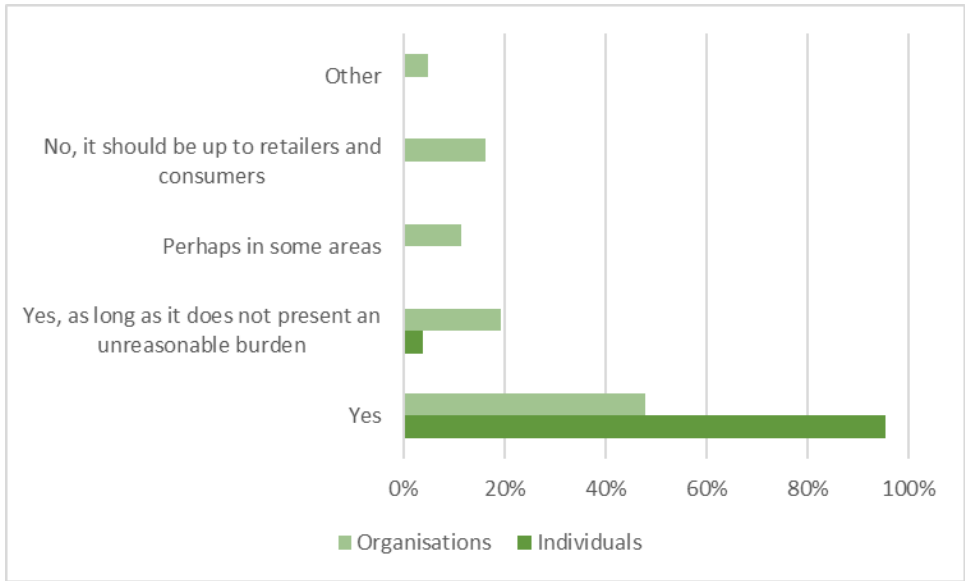
This annex breaks down the quantitative data on the four questions to which over 75% of respondents responded: Questions 17, 22, 24, and 25. While the high proportion of responses to these questions reflects high levels of interest among respondents, this data is not assumed to be representative of the wider population. The purpose of this call for evidence was to help address evidence gaps around the potential impact of different types of welfare labelling reform; as such, policy development will be informed by the strength of the evidence and insights provided.

Question 17

This question asked respondents: 'Should the UK government reform labelling to ensure greater consistency and understanding of animal welfare information at the point of purchase?'

We received 1,576 responses to this question. Over 99% of responses from individuals felt that the Government should reform labelling. 1,408 individuals answered 'Yes', and 56 answered 'Yes, as long as it does not present an unreasonable burden to farmers and food industry'. 2 answered 'Perhaps in some cases'. 4 answered 'No, it should be up to retailers and consumers'. 2 selected 'Other'. This is shown as percentages in Figure 2, below.

Of the 104 organisations that responded to this question, 50 answered 'Yes'. 20 answered 'Yes, as long as it does not present an unreasonable burden to farmers and food industry'. 12 answered 'Perhaps in some cases'. 17 answered 'No, it should be up to retailers and consumers'. 5 selected 'Other'. This is shown as percentages in Figure 5, below.

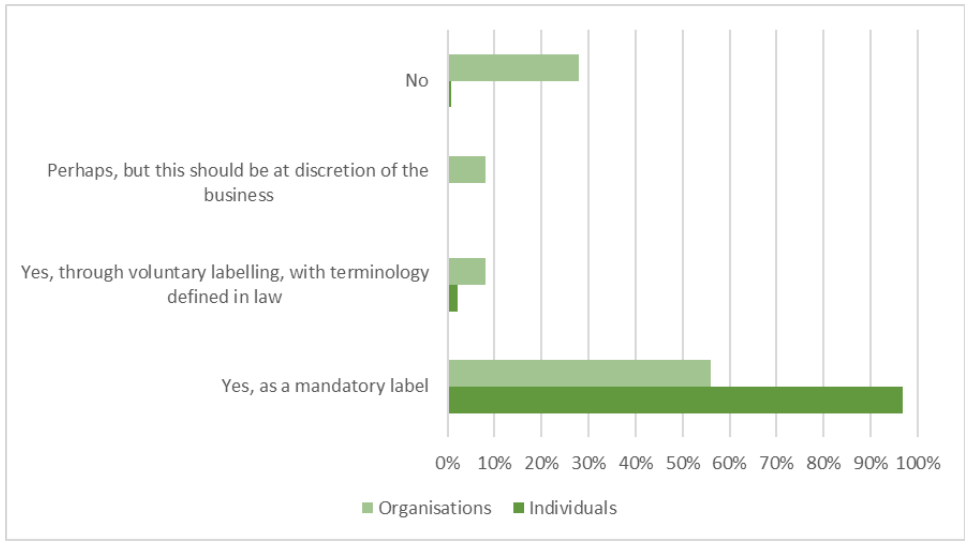


Question 22

This question asked respondents: ‘Do you think that products containing meat should be labelled to indicate the method of slaughter to consumers? Please select: Yes, as a mandatory label – Yes, through voluntary labelling, with terminology defined in law – Perhaps, but this should be at discretion of the business – No’

We received 1,413 responses to this question. Almost 99% of responses from individuals felt that the Government should introduce method of slaughter labelling. 1,367 individuals answered ‘Yes, as a mandatory label’, and 31 answered ‘Yes, through voluntary labelling, with terminology defined in law’. 5 answered ‘Perhaps, but this should be at discretion of the business’. 10 answered ‘No’. This is shown in Figure 6, below.

Of the 75 organisations that responded to this question, 42 answered ‘Yes, as a mandatory label’. 6 answered ‘Yes, through voluntary labelling, with terminology defined in law’. 6 answered ‘Perhaps, but this should be at discretion of the business’. 21 answered ‘No’. This is shown as percentages in Figure 3, below.



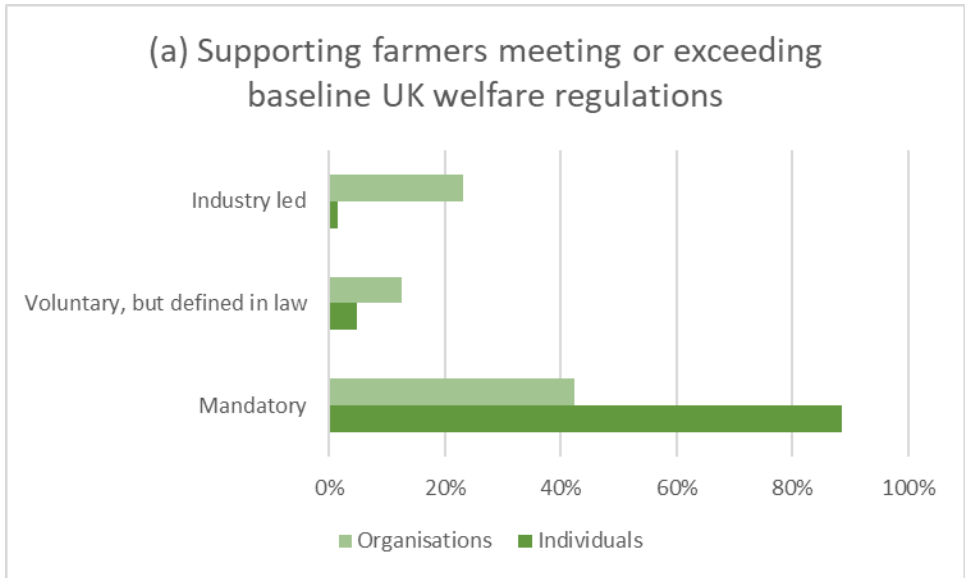
Question 24

This question asked respondents: Which type of labelling could be most effective at:

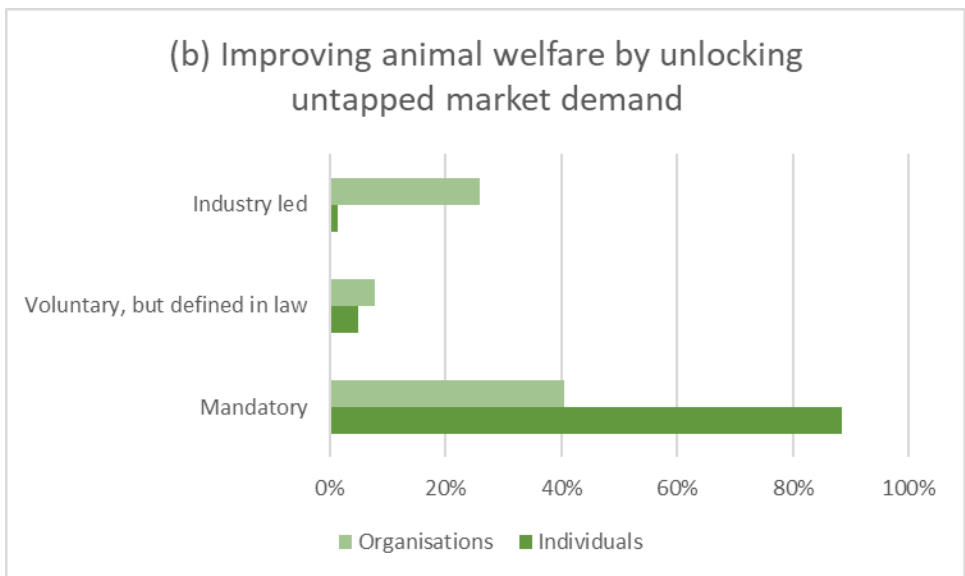
- a) Supporting farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market?
- b) Improving animal welfare by unlocking untapped market demand for higher welfare products?
- c) Ensuring UK baseline and higher welfare products are accessible, available, and affordable so that it is easy for consumers to choose food products that align with their values?

Please select: Mandatory – Voluntary, but defined in law – Industry-led

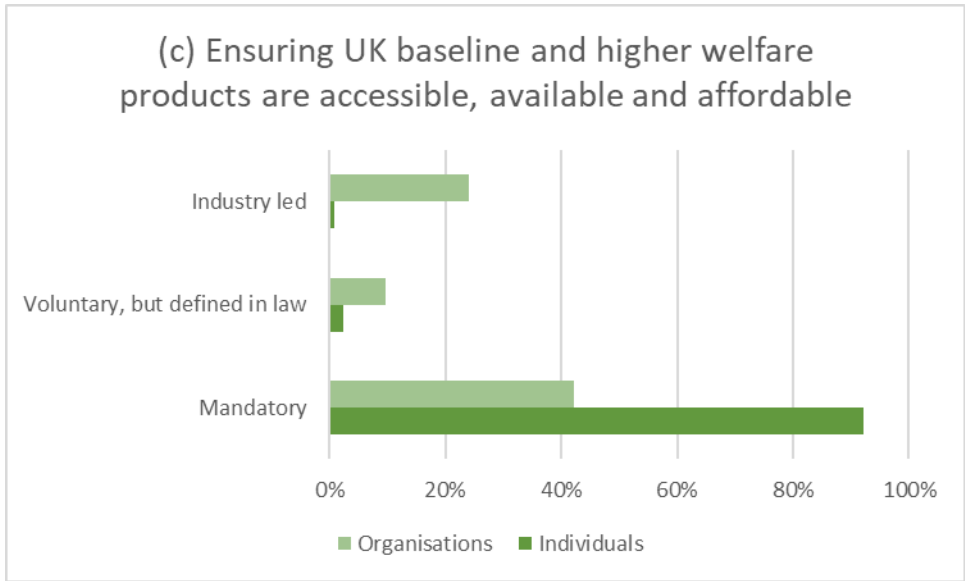
We received 1,478 responses to part (a) of this question. Of those, 1,306 individuals and 44 organisations suggested that mandatory labelling would be most effective at supporting farmers meeting or exceeding UK baseline welfare standards. 71 individuals and 13 organisations felt that voluntary measures defined in law would be most effective. 20 individuals and 24 organisations felt that industry-led reform would be most effective. This is shown as percentages in Figure 7, below.



We received 1,470 responses to part (b) of this question. Of those, 1,303 individuals and 42 organisations suggested that mandatory labelling would be most effective at improving animal welfare by unlocking untapped market demand. 71 individuals and 8 organisations felt that voluntary measures defined in law would be most effective. 19 individuals and 27 organisations felt that industry-led reform would be most effective. This is shown as percentages in Figure 8, below.



We received 1,483 responses to part (c) of this question. Of those, 1,355 individuals and 44 organisations suggested that mandatory labelling would be most effective at ensuring UK baseline and higher-welfare products are accessible, available, and affordable. 37 individuals and 10 organisations felt that voluntary measures defined in law would be most effective. 12 individuals and 25 organisations felt that industry-led reform would be most effective. This is shown as percentages in Figure 9, below.



Question 25

This question asked respondents: To what extent do you support the principle of mandatory labelling to identify when imported meat, eggs and milk do not meet baseline UK welfare regulations?

We received 1,576 responses to this question. Over 97% of responses from individuals strongly supported the principle of mandatory labelling of imports. Of the 78 organisations that responded to this question, 65 expressed strong support; 4 partial support; 1 neutral; 4 partial opposition; and 4 strong opposition. This is shown as percentages in Figure 10, below.

